

MARK UP Jim Henderson 1/30/11



Memorandum

Date: January 28, 2011

To: Jim Henderson
County of San Diego
Department of Environmental Health
Local Enforcement Agency

From: David Marx, Project Manager

cc: Kristen Walker Potente

Subject: **Review of Applicant's Response to Comments - Gregory Canyon Landfill**

This memo summarizes our review of the applicant's response to comments for the Gregory Canyon Landfill as requested in your email dated January 24, 2011. The applicant provided response to comments on the following matrices:

1. *Response to URS Comments, Table 1 – Gregory Canyon Landfill – Title 27 Compliance Matrix*
2. *Response to URS Comments, Table 2 – Gregory Canyon Joint Technical Document/Solid Waste Facility Permit (JTD/SWFP) Application Inconsistencies and Other Comments*
3. *Response to Comments – LEA Comments on the Draft September 2010 Permit Application Package*
4. *Response to URS Comments, Table 1 – Review of JTD (Including PCPMP) and CEQA*

The results of our review are itemized below. Though most of the comments can be characterized as housekeeping or consistency refinements, Item 27 in *Response to URS Comments, Table 2 – Gregory Canyon JTD/SWFP Application Inconsistencies and Other Comments*, is an item that reflects on correctness of the JTD. Additionally, the responses to Items 79 and 80 (related to the fire district, and that have been referred to County counsel) in *Response to Comments – LEA Comments on the Draft September 2010 Permit Application Package*, are really legal issues that need to be addressed by legal counsel.

Satisfactorily addressing these items and completing the minor edits related to housekeeping and consistency refinements would result in a complete and correct JTD in accordance with California Code of Regulations Title 27.

RESPONSE TO URS COMMENTS, TABLE 1 – GREGORY CANYON LANDFILL – TITLE 27 COMPLIANCE MATRIX

All of the comments and deficiencies have been adequately addressed.

RESPONSE TO URS COMMENTS, TABLE 2 – GREGORY CANYON JTD/SWFP APPLICATION INCONSISTENCIES AND OTHER COMMENTS

All of the comments have been adequately addressed with the exceptions noted as follows:

- **Item 5** – Correction made; however, suggest adding “mcy” after 2.7. *B.4-17 DONE*
- **Item 8** – Section B.3.1.4, Figure 2: The water tank and proposed well locations west of Stockpile B are not included on Figure 2. *B.3-4 BA? OK*
- **Item 10** – Sections B.4.4.8, C.2.2.3, C.3.2, and Appendix B-2 are now consistent; however, the Net Capacity identified in Appendix U is not consistent with the text of the JTD (45,592,118 cy versus 45.4 mcy) and Section B.1.6 also states 45.6 mcy. *DONE*
- **Item 17** – Text in Section C.2.2.4 has been updated; however, should say “Appendix C” as indicated in the Response column, not Appendix C-1 as stated in text of JTD. *VALID TYPED*
- **Item 27** – Section E.1.4.2. The Response states: “The text has been corrected to indicate that there is one permanent survey monument.”

Two survey monument locations are required as specified in 27 CCR 20950 (d):

“**Surveying Monuments** - Closed Units shall be provided with at least two permanent monuments installed by a licensed land surveyor or a registered civil engineer, from which the location and elevation of wastes, containment structures, and monitoring facilities can be determined throughout the post closure maintenance period.”

The original text should be restored. Additionally, either the second monument location should be included on Figure 9, or the sentence that states: “The locations proposed for the monuments are shown on Figure 9” could be deleted as there is no requirement to identify the specific monument locations in the PCPMP. *YES*

- **Item 28** – Correction made to acronym only in Section C.2.8.3.4; text should be edited as follows: “**Revised** Universal Soil Loss Equation.” *p C.2-20 TYPED*
- **Item 36** – Section D.4.6 and Appendix C: Figure 3-3A in Appendix C has changed from the previous submittal to reflect a more recent stability analysis as indicated in the response to Item 17. The lowest factor of safety value is now 1.9 instead of 1.5. The text in Section D.4.6 should refer to a factor of safety of 1.9 for the stockpile. *D.4-16 Δ 1.5 to 1.9*
- **Item 39** – Improvements to the User’s Guide will assist in consolidating like mitigation measures from different source documents and it will streamline mitigation monitoring. Deferring the improvements to the User’s Guide will not change the completeness or correctness of the JTD. *LATEL*
- **Item 41** – The Response indicates that “when the landfill reaches full build out, the peak volume will likely increase when compared to existing conditions.” Though not a Title 27 issue, the Municipal Stormwater NPDES will require that stormwater volumes that leave the site at full

buildout will need to be less than pre-construction volumes. The RWQCB will evaluate the size of the infiltration basins to confirm this. *LATER NOT AN LEA ISSUE*

RESPONSE TO COMMENTS – LEA COMMENTS ON THE DRAFT SEPTEMBER 2010 PERMIT APPLICATION PACKAGE

All of the comments have been adequately addressed with the exceptions noted as follows:

SWFP

- **Item 1** – Please note Response indicates “to be provided.” Suggest revising Page 4 as follows: *→ except for the Water Course Alternative Permit... p.4 GASS COVER LETTER*
- **Item 3** – URS did not review hardcopy SWFP; therefore, cannot verify this response.
- **Item 4** – URS did not review hardcopy SWFP; therefore, cannot verify this response.
- **Item 6** – The Latitude/Longitude in the SWFP Application is 33.347777, -117.117560; however, the minus sign is missing for 117.117560 in the 404 Permit Application (which is included as SWFP Attachment D-4). *N/A*
- **Item 12** – URS was not privy to the LEA discussion; therefore, cannot verify this response. *OK*
- **Item 13** – Airspace yardages are consistent between the JTD and SWFP. (Note – This may need to be re-checked depending on the resolution to **Table 2, Item 10** above.) *DONE*
- **Item 20** – Signatures are current and dated 1/13/11. *RESOLVED*
- **Item 28** – See response to URS Table 2, Item 39. *LATER*

JTD

- **Item 32** – Note that URS did not verify that the page numbers of the table of contents correctly correlate to the actual page(s) within the JTD. *APPEAR OK*
- **Item 47** – Suggest adding label to Figure 2 pointing to the location of the temporary construction yard. *DONE*
- **Item 60** – Comment requests first spell out of “PGM” to occur with first use in document. JTD revised per comment; however, first occurrence is actually in B.1.5.4. *OK p B.1-10*
- **Item 66** – The use of portable lighting to provide safe working conditions during end of the day cover operations during winter months, which is limited to before 6 pm Monday through Friday and 5 pm on Saturday (see Section B.4.1), would typically not be considered “nighttime” operations. *→ p B.4-1 + B.4-21 DON'T SEE THIS*
- **Item 79 & 80** – These appear to be legal questions; therefore, URS cannot verify these responses. *N/A*
- **Item 94** – Note: Text in JTD is correct. Comma location shown in the Response column is not. *OK*
- **Item 121** – Calculations in Table 17 were verified as correct. (URS did not verify calculations in the Back-Up information contained in Appendix R.) *OK*

- **Item 124** – Verified calculations in Table 18 as correct; however, note that the rounding of the Estimated Quantity x Unit Price in Item No. 8 for Rodent Control is inconsistent with the rounding of the other calculations in the table. If this item is rounded to the nearest dollar to be consistent with the rounding in the rest of the table, the Total would be \$2,488, not \$2,500. (URS did not verify any calculations in the Back-Up information contained in Appendix R.)

RESPONSE TO URS COMMENTS, TABLE 1 – REVIEW OF JTD (INCLUDING PCPMP) AND CEQA

All of the comments have been adequately addressed.

★ ITEMS TO FIX MON 1/31

• TYPES TO FIX

Jim Henderson

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